

October 21, 1997

Section 608 Recycling Program Manager Stratospheric Ozone Protection Branch (6205-J) U.S. Environmental Protection Agency 401 M St., S.W. Washington, D.C. 20460

Subject: Reclaimer Certification

Dear Program Manager:

This correspondence is submitted in accordance with 40 CFR P82.164(a) through (d) requesting reclaimer certification of FRC International, Inc.

I certify to be true and correct that Reclamation Technologies, Inc.:

- (a) reclaims used refrigerant to at least the standard of purity set forth in the Air-Conditioning and Refrigeration Institute (ARI) Standard 700-95, Specifications for Fluorocarbon and Other Refrigerants.
- (b) verifies the purity using the analytic methodology set forth in Appendix C of ARI Standard 700-95.
- (c) releases no more than 1.5 percent of the refrigerant during the reclamation process; and
- (d) disposes of wastes from the reclamation process in accordance with all applicable laws and regulations.

As additional information, the name and address of the reclaimer is:

FRC International, Inc.

6150 Merger Drive

Holland, OH 43537

The equipment used has been designed and manufactured and patented by FRC International, Inc. It includes their MARS 2000, Defender 2000, and distillation tower. The laboratory includes a Hewlett Packard Gas Chromatograph machine, a Coulometric Karl Fischer Titration apparatus, and the Goetz Bulb testing apparatus. In addition, all reclaimed refrigerant to be sold to customers will be tested by an independent laboratory, Integral Sciences in Columbus, Ohio.

Very Multy yours

Richard M. Marcus

President



Tuesday, December 02, 1997

Mr. Jake Johns U.S. EPA 401 M Street S W US EPA/OAR (6205-J) Stratospheric Protection D Washington, D.C. 20460

Subject: Halocarbon Reclaimer Certification

Dear Jake:

In accordance with your recent request we have enclosed information regarding our equipment. Please note that the following equipment will also be utilized by our sister company REMTEC, Inc. and is also part of their application.

- 1. Defender 2000, Model C-400 HP
- 2. MARS, Modular Automated Reclaiming System
- 3. CPT, Cylinder Piercing Technology
- 4. Separation / Distillation Tower

The above mentioned equipment will be used during the recovery, and reclaiming of various halocarbons. These agents are processed to ARI-700 specifications, or if that is not feasible we also have access to destruction technology. If destruction is necessary our other sister company FRC Australia, Melbourne Australia will manage the destruction process in conjunction with the Department of Administrative Services for Environmental Management at our Tottenham, Australia facilities.

Please let us know if any additional information is needed.

Sincerely

Richard Marcus

President